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9 Bonta, in his official capacity as Attorney General of
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13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

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ARNOLD ABRERA, Plaintiff,
v.
**GAVIN NEWSOM, in his official capacity
as Governor of the State of California; et al.** Defendants.

Case No.: 2:22-cv-01162-JAM-DB
**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANTS NEWSOM AND BONTA
TO RESPOND TO FIRST AMENDED
COMPLAINT**

**[Fed. R. Civ. P., Rule 6(b);
E.D. Cal. Civil Local Rules 143, 144(b)]**

Judge: Honorable John A. Mendez
Trial Date: None Set
Action Filed: July 5, 2022

STIPULATION

Per Rule 6(b) of the Federal Rules of Civil Procedure and Civil Local Rules 143 and 144(b), Defendants Governor Gavin Newsom and Attorney General Rob Bonta (the State Defendants), and Plaintiff Arnold Abrera, stipulate to extend the State Defendants' deadline to file a responsive pleading to Plaintiff's First Amended Complaint (ECF No. 16) to November 16, 2023.

1 The requested extension is 28 days after the State Defendants' present responsive pleading
2 deadline, and therefore is permitted under Rule 6(b) of the Federal Rules of Civil Procedure and
3 Civil Local Rules 143 and 144(b). Plaintiff's counsel consents to this extension of time.

4 This is the second extension of time sought with respect to any of the State Defendants'
5 responses to a pleading in this matter, and the extension will not affect the date of any event or
6 other deadline already fixed by the Court.

7 The parties further stipulate that this extension is neither intended nor will be construed as a
8 waiver of any objection or defense that the State Defendants may have or could assert against the
9 First Amended Complaint.

10 **IT IS SO STIPULATED.**

11 Dated: October 16, 2023

Respectfully submitted,

12 ROB BONTA
13 Attorney General of California
14 ANYA M. BINSACCA
15 Supervising Deputy Attorney General

16 _____
17 /s/ *Jay C. Russell*
18 JAY C. RUSSELL
19 Deputy Attorney General
20 *Attorneys for Defendants Gavin Newsom, in*
21 *his official capacity as Governor of*
22 *California, and Rob Bonta, in his official*
23 *capacity as Attorney General of California*

19 Dated: October 16, 2023

Respectfully submitted,

20 VETERANS LAW CENTER
21 STRATEGIC LAW COMMAND

22 _____
23 /s/ *Gary W. Gorski*
24 GARY W. GORSKI, ESQ.
25 DANIEL M. KARALASH, ESQ.
26 *Attorneys for Plaintiff Arnold Abrera*

1 [PROPOSED] ORDER
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Under the above Stipulation, the time for Defendants Newsom and Bonta to respond to the
First Amended Complaint is extended to November 16, 2023.

4 **IT IS SO ORDERED.**
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Hon. John A. Mendez
United States District Court Judge
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CERTIFICATE OF SERVICE

Case Name: *Abrera, Arnold v. Gavin
Newsom, et al.*

Case No. **2:22-cv-01162-JAM-DB**

I hereby certify that on October 16, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR DEFENDANTS NEWSOM AND BONTA TO RESPOND TO FIRST AMENDED COMPLAINT

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on October 16, 2023, at San Francisco, California.

M. Mendiola
Declarant

M. Mendiola
Signature

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